



30  
2/26/16

SE

16003155

OMB APPROVAL	
OMB Number:	3235-0123
Expires:	March 31, 2016
Estimated average burden hours per response	12.00

**ANNUAL AUDITED REPORT  
FORM X-17A-5  
PART III**

SEC FILE NUMBER
8- 51871

SEC  
Mail Processing  
Section

FACING PAGE

**Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder**

REPORT FOR THE PERIOD BEGINNING 01/01/2015 AND ENDING 12/31/2015  
MM/DD/YY MM/DD/YY

**A. REGISTRANT IDENTIFICATION**

NAME OF BROKER-DEALER: LEGACY ASSET SECURITIES, INC.

OFFICIAL USE ONLY
FIRM I.D. NO.

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

3411 RICHMOND AVENUE, SUITE 750

(No. and Street)

HOUSTON

TEXAS

77046

(City)

(State)

(Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

(Area Code - Telephone Number)

**B. ACCOUNTANT IDENTIFICATION**

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report\*

LBB & ASSOCIATES LTD, LLP.

(Name - if individual, state last, first, middle name)

10260 WESTHEIMER ROAD

HOUSTON

TEXAS

77042

(Address)

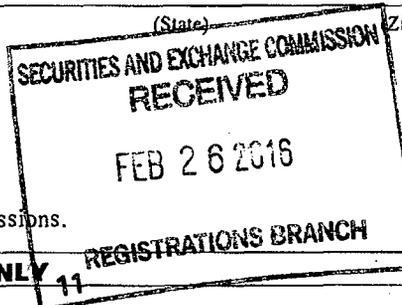
(City)

(State)

(Zip Code)

CHECK ONE:

- Certified Public Accountant
- Public Accountant
- Accountant not resident in United States or any of its possessions.



FOR OFFICIAL USE ONLY 11

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

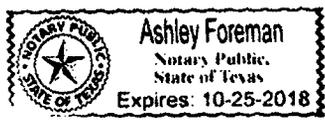
SEC 1410 (06-02)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

3/2

OATH OR AFFIRMATION

I, Joseph R. Birkofer, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of Legacy Asset Securities, Inc., as of December 31, 2015, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:



Joseph R. Birkofer  
Signature  
President  
Title

Ashley Foreman  
Notary Public

This report \*\* contains (check all applicable boxes):

- (a) Facing Page.
- (b) Statement of Financial Condition.
- (c) Statement of Income (Loss).
- (d) Statement of ~~Changes in Financial Condition~~. Cash Flows
- (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
- (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors.
- (g) Computation of Net Capital.
- (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
- (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- (l) An Oath or Affirmation.
- (m) A copy of the SIPC Supplemental Report.
- (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

\*\*For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

**LEGACY ASSET SECURITIES, INC.**  
**FINANCIAL STATEMENTS**  
**DECEMBER 31, 2015**

**LEGACY ASSET SECURITIES, INC.**  
**Table of Contents**

	<u>Page</u>
Report of Independent Registered Public Accounting Firm	1
Statement of Financial Condition	2
Statement of Operations	3
Statement of Changes in Shareholders' Equity	4
Statement of Cash Flows	5
Notes to Financial Statements	6-8
 <b>SUPPLEMENTARY INFORMATION</b>	
Schedule I – Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission	10
Schedule II – Computation for Determination of Reserve Requirements and Information Relating to Possession or Control of Securities Under Rule 15c3-3 of the Securities and Exchange Commission	11
Report of Independent Registered Public Accounting Firm on the Exemption Report	12
Exemption Report	13
Independent Accountants' Agreed-Upon Procedures Report on Schedule of Assessment and Payments (Form SIPC-7)	14
Schedule of Assessment and Payments to the Securities Investor Protections Corporation (SIPC) for the year ended December 31, 2015	15-16

**Report of Independent Registered Public Accounting Firm**

To the Board of Directors  
of Legacy Asset Securities, Inc.  
Houston, Texas

We have audited the accompanying statement of financial condition of Legacy Asset Securities, Inc. as of December 31, 2015, and the related statements of operations, changes in shareholders' equity, and cash flows for the year then ended. These financial statements are the responsibility of Legacy Asset Securities, Inc.'s management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Legacy Asset Securities, Inc. as of December 31, 2015, and the results of its operations and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

The Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission and Computation for Determination of Reserve Requirements and Information Relating to Possession or Control of Securities Under Rule 15c3-3 of the Securities and Exchange Commission have been subjected to audit procedures performed in conjunction with the audit of Legacy Asset Securities, Inc.'s financial statements. The supplemental information is the responsibility of Legacy Asset Securities, Inc.'s management. Our audit procedures included determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the supplemental information. In forming our opinion on the supplemental information, we evaluated whether the supplemental information, including its form and content, is presented in conformity with 17 C.F.R. §240.17a-5. In our opinion, the supplemental information is fairly stated, in all material respects, in relation to the financial statements as a whole.

*LBB & Associates Ltd., LLP*

LBB & Associates Ltd., LLP  
Houston, Texas  
February 19, 2016

**LEGACY ASSET SECURITIES, INC.**  
**Statement of Financial Condition**  
**December 31, 2015**

**ASSETS**

Cash and cash equivalents	<u>\$ 10,947</u>
Total assets	<u><u>\$ 10,947</u></u>

**LIABILITIES AND SHAREHOLDERS' EQUITY**

Liabilities

Accounts payable	<u>\$ -</u>
------------------	-------------

Total liabilities	<u>-</u>
-------------------	----------

Commitments and contingencies

Shareholders' Equity

Common stock, \$0.001 par value, 1,000,000 shares authorized, 1,000,000 shares issued and outstanding	1,000
--	-------

Additional paid-in capital	59,018
----------------------------	--------

Retained earnings (deficit)	<u>(49,071)</u>
-----------------------------	-----------------

Total shareholders' equity	<u>10,947</u>
----------------------------	---------------

Total liabilities and shareholders' equity	<u><u>\$ 10,947</u></u>
--	-------------------------

The accompanying notes are an integral part of the financial statements

**LEGACY ASSET SECURITIES, INC.**  
**Statement of Operations**  
**For the year ended December 31, 2015**

**Revenue:**

Commission income	\$ 220,663
Forgiveness of payable to affiliated company	433,544
Interest income	<u>3</u>
 Total revenues	 <u>654,210</u>

**Expenses:**

Office service expenses to affiliated company	566,430
General and administrative	<u>88,413</u>
 Total expenses	 <u>654,843</u>
 Net loss	 <u>\$ (633)</u>

The accompanying notes are an integral part of the financial statements

**LEGACY ASSET SECURITIES, INC.**  
**Statement of Changes in Shareholders' Equity**  
**For the year ended December 31, 2015**

	<u>Common Stock</u>		<u>Additional</u>		<u>Retained</u>		<u>Total</u>
	<u>Shares</u>	<u>Amount</u>	<u>Capital</u>	<u>(Deficit)</u>	<u>(Deficit)</u>		
Balance at December 31, 2014	1,000,000	\$ 1,000	\$ 59,018	\$ 1,562	\$ 61,580		
Distributions to owners	-	-	-	(50,000)	(50,000)		
Net loss	-	-	-	(633)	(633)		
Balance at December 31, 2015	<u>1,000,000</u>	<u>\$ 1,000</u>	<u>\$ 59,018</u>	<u>\$ (49,071)</u>	<u>\$ 10,947</u>		

The accompanying notes are an integral part of the financial statements

**LEGACY ASSET SECURITIES, INC.**  
**Statement of Cash Flows**  
**For the year ended December 31, 2015**

<b>CASH FLOWS FROM OPERATING ACTIVITIES:</b>	
Net loss	\$ (633)
Adjustments to reconcile net loss to cash provided by operating activities:	
Cash deposit with clearing organization	60,509
Accounts payable	<u>(1,479)</u>
Net cash provided by operating activities	<u>58,397</u>
<b>CASH FLOWS FROM FINANCING ACTIVITIES:</b>	
Distributions to principal owners	<u>(50,000)</u>
Net cash used in financing activities	<u>(50,000)</u>
Net increase in cash	8,397
Cash and cash equivalents, beginning of year	<u>2,550</u>
Cash and cash equivalents, end of year	<u>\$ 10,947</u>

The accompanying notes are an integral part of the financial statements

**LEGACY ASSET SECURITIES, INC.**  
**NOTES TO FINANCIAL STATEMENTS**  
**December 31, 2015**

**Note 1 – Organization and Nature of Business**

Legacy Asset Securities, Inc. (the “Company”), a Texas S-corporation organized in March 1999, is a registered broker-dealer with the Securities and Exchange Commission (“SEC”) and a member of Financial Industry Regulatory Authority (“FINRA”). The Company, located in Houston, Texas, converted in October 2015 from an introducing broker-dealer whereby all trades were cleared on a fully-disclosed basis, to an application way broker-dealer. The Company’s business activities are now limited to the purchase, sale and redemption of redeemable securities of registered investment companies or of interests or participations in an insurance company separate account. The Company does not maintain any customer accounts and does not retain custody of any customer assets. The Company received its FINRA approval for membership on November 5, 1999. The Company is exempt from Rule 15c3-3 of the SEC under paragraph (k)(1)(i), (k)(1)(ii)(a), (k)(1)(iii) and (k)(2)(ii) (for part of the year) of that rule.

**Note 2 – Summary of Significant Accounting Policies**

*Statement Presentation*

The unclassified Statement of Financial Condition is presented in accordance with industry standards.

*Revenue Recognition*

Transactional commissions are recognized when trades settle, and receivables are recorded at that time. Servicing fee commissions are recognized when received. Interest revenue is recorded when it is earned.

*Cash and Cash Equivalents*

The Company considers all short-term investments with an original maturity of three months or less to be cash equivalents.

*Cash Deposit with Clearing Organization*

The Company converted in October 2015 from an introducing broker-dealer whereby all trades were cleared on a fully-disclosed basis, to an application way broker-dealer. The Company’s business activities are now limited to the purchase, sale and redemption of redeemable securities of registered investment companies or of interests or participations in an insurance company separate account. Through February 2015, the Company cleared all of its customer transactions through another broker-dealer on a fully-disclosed basis. Once this relationship was terminated, the clearing deposit was returned. Under its new status, the Company is not required to maintain any clearing deposits. As of December 31, 2015, the Company had no deposits with the clearing broker-dealer.

**LEGACY ASSET SECURITIES, INC.**  
**NOTES TO FINANCIAL STATEMENTS**  
**December 31, 2015**

**Note 2 – Summary of Significant Accounting Policies (continued)**

*Income Taxes*

The Company has elected S-corporation status for federal income tax purposes. Under S-corporation regulations, net income or loss is reportable for tax purposes by the shareholders. Accordingly, no federal income taxes are included in the accompanying financial statements. In 2015, the Company was not subject to income taxes in the state of Texas since its gross receipts were under the minimum taxable amount imposed by the state.

Management of the Company considers the likelihood of changes by taxing authorities in its filed income tax returns and recognizes a liability for potential changes that management believes are more-likely-than-not to occur upon examination by tax authorities, including changes to the Company's status as an S-corporation. Management has not identified any uncertain tax positions in filed income tax returns that require recognition or disclosure in the accompanying financial statements. The Company's income tax returns for the past three years are subject to examination by tax authorities, and may change upon examination. The Company's policy is to recognize interest and penalties, if any, related to any underpayment of taxes and penalties in interest expense and operating expenses, respectively.

*Use of Estimates*

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosures of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

*Subsequent Events*

The Company has reviewed for subsequent events through February 19, 2016, the date these financial statements were available to be issued.

*Recently Issued Pronouncements*

The Company does not expect recently issued but not yet adopted accounting pronouncements will have a material impact on the Company's financial statements at the time of adoption.

**Note 3 – Net Capital Requirements**

Pursuant to the net capital provisions of Rule 15c3-1 of the Securities Exchange Act of 1934, the Company is required to maintain a minimum net capital, as defined under such provisions. Net capital and the related net capital ratio may fluctuate on a daily basis.

There were no material inadequacies found to exist in the computation of the ratio of aggregate indebtedness to net capital at December 31, 2015, or in the procedures followed in making the periodic computation required. As December 31, 2015, the Company had a net capital of \$10,747 and a net capital requirement of \$5,000. The Company's aggregate indebtedness to net capital was 0 to 1. The Securities and Exchange Commission permits a ratio for the Company at this time of no greater than 15 to 1.

**LEGACY ASSET SECURITIES, INC.**  
**NOTES TO FINANCIAL STATEMENTS**  
**December 31, 2015**

**Note 4 – Related Party Transactions**

The Company has entered into an expense-sharing agreement for general office services with Legacy Asset Management, Inc., a party related through common ownership. The Company recorded office services expenses of \$566,430 for the year ended December 31, 2015 in connection with this agreement. Also, in accordance with the expense-sharing agreement, \$433,544 of these expenses was forgiven by Legacy Asset Management, Inc. for the year ended December 31, 2015. The expenses covered in the agreement include, but are not limited to, office space, clerical support, and communications systems.

**Note 5 – Profit Sharing Plan**

The Company is an adopting employer of the Legacy Asset Management Retirement Plan (the "Plan"), which is available for all eligible employees, as defined by the plan document. Under the Plan, the Company makes matching contributions equal to 100% of each employee's salary deferral that does not exceed 3% of the employee's compensation, plus 50% of the employee's salary deferral between 3% and 5% of the employee's compensation. For the year ended December 31, 2015, the Company made no matching contributions.

**Note 6 – Commitments and Contingencies**

In the opinion of management, there are no known commitments or contingencies that are expected to have a material adverse effect on the Company's financial position, results of operations or cash flows.

**Note 7 – Reconciliation of Amounts Reported by the Company in Part II of Form X-17A-5**

The following is a reconciliation of additional paid-in capital and retained earnings per Form X-17A-5 to the financial statements at December 31, 2015:

Additional paid-in capital per Form X-17A-5	\$ (12,982)
Add: Prior equity distributions	<u>72,000</u>
Additional paid-in capital per financial statements	<u>\$ 59,018</u>
Retained earnings per Form X-17A-5	\$ 22,929
Less: Prior equity distributions	<u>(72,000)</u>
Retained earnings (deficit) per financial statements	<u>\$ (49,071)</u>

**SUPPLEMENTARY INFORMATION**

**LEGACY ASSET SECURITIES, INC.**  
**SCHEDULE I - COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1**  
**OF THE SECURITIES AND EXCHANGE COMMISSION**  
**AS OF DECEMBER 31, 2015**

Total Ownership Equity	\$	10,947
Less: non-allowable assets		<u>-</u>
Net capital before haircuts on securities positions		10,947
Haircuts on securities positions		<u>200</u>
Net capital (1)	\$	<u>10,747</u>
Total aggregate indebtedness	\$	<u>-</u>
Computation of basic net capital requirement		
Minimum capital required [under subparagraph (a)(2) or Rule 15c3-1]	\$	<u>5,000</u>
Excess of net capital over minimum requirement	\$	<u>5,747</u>
Ratio of aggregate indebtedness to net capital		<u>0.00 to 1</u>

(1) As of December 31, 2015, there are no material differences between the audited computation of net capital and the Company's unaudited computation of net capital as per Part IIA of the Company's December 31, 2015 quarterly Form X-17A-5 FOCUS report.

**LEGACY ASSET SECURITIES, INC.**  
**SCHEDULE II - COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS**  
**AND INFORMATION RELATING TO POSSESSION OR CONTROL OF SECURITIES**  
**UNDER RULE 15c3-3 OF THE SECURITIES AND EXCHANGE COMMISSION**  
**As of December 31, 2015**

**Exemption Provisions**

The Company has claimed an exemption from Rule 15c3-3 under Section (k)(1), provided to broker dealers that limit their activities to the purchase, sale and redemption of redeemable securities of registered investment companies or of interests or participations in an insurance company separate account.

**REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM**

To the Board of Directors  
Legacy Asset Securities, Inc.  
Houston, Texas

We have reviewed management's statements, included in the accompanying Exemption Report, in which (1) Legacy Asset Securities, Inc. identified the following provisions of 17 C.F.R. §15c3-3(k) under which Legacy Asset Securities, Inc. claimed an exemption from 17 C.F.R. §240.15c3-3: (1) and (2)(ii) (the "exemption provisions") and (2) Legacy Asset Securities stated that Legacy Asset Securities, Inc. met the identified exemption provisions in 17 C.F.R. §240.15c3-3(k)(2)(ii) from January 1, 2015 through July 31, 2015, and met the identified exemption provisions in 17 C.F.R. §240.15c3-3(k)(1) from August 1, 2015 through December 31, 2015 without exception. Legacy Asset Securities, Inc.'s management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about Legacy Asset Securities, Inc.'s compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(1) and (2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934.

*LBB & Associates Ltd., LLP*

LBB & Associates Ltd., LLP  
Houston, TX  
February 19, 2016

**LEGACY ASSET SECURITIES, INC. EXEMPTION REPORT**

Legacy Asset Securities, Inc. (the "Company") is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. §240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

(1) The Company claimed an exemption from 17 C.F.R. §240.15c3-3 under the following provisions of 17 C.F.R. §240.15c3-3(k): (1) and (2)(ii)

(2) The Company met the identified exemption provisions in 17 C.F.R. §240.15c3-3(k)(2)(ii) from January 1, 2015 through July 31, 2015. The Company met the identified exemption provisions in 17 C.F.R. §240.15c3-3(k)(1) from August 1, 2015 through December 31, 2015 without exception.

Legacy Asset Securities, Inc.

I, Joe R. Birkofer, swear (or affirm) that, to my best knowledge and belief, this Exemption Report is true and correct.

By: 

Title: *PRESIDENT*

February 19, 2016

**INDEPENDENT ACCOUNTANT'S AGREED-UPON PROCEDURES REPORT  
ON SCHEDULE OF ASSESSMENT AND PAYMENTS (FORM SIPC-7)**

Board of Directors of Legacy Asset Securities, Inc.

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments (Form SIPC-7) to the Securities Investor Protection Corporation (SIPC) for the year ended December 31, 2015, which were agreed to by Legacy Asset Securities, Inc., and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and SIPC, solely to assist you and the other specified parties in evaluating Legacy Asset Securities, Inc.'s compliance with the applicable instructions of Form SIPC-7. Legacy Asset Securities, Inc.'s management is responsible for Legacy Asset Securities, Inc.'s compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

- 1) Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement records entries, noting no differences;
- 2) Compared the amounts reported on the audited Form X-17A-5 for the year ended December 31, 2015, as applicable, with the amounts reported in Form SIPC-7 for the year ended December 31, 2015, noting no differences;
- 3) Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers, noting no differences;
- 4) Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting the adjustments noting no differences; and
- 5) Compared the amount of any overpayment applied to the current assessment with the Form SIPC-7 on which it was originally computed, noting no differences.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

*LBB & Associates Ltd., LLP*

LBB & Associates Ltd., LLP  
Houston, TX  
February 19, 2016

**SIPC-7**

(33-REV 7/10)

SECURITIES INVESTOR PROTECTION CORPORATION  
P.O. Box 92105 Washington, D.C. 20090-2105  
202-371-0300

**General Assessment Reconciliation**

For the fiscal year ended 12/31/2015  
(Read carefully the instructions in your Working Copy before completing this Form)

**SIPC-7**

(33-REV 7/10)

**TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS**

1. Name of Member, address, Designated Examining Authority, 1934 Act registration no. and month in which fiscal year ends for purposes of the audit requirement of SEC Rule 17a-5:

20\*20\*\*\*\*\*2809\*\*\*\*\*MIXED AADC 220  
051871 FINRA DEC  
LEGACY ASSET SECURITIES INC  
3411 RICHMOND AVE STE 750  
HOUSTON TX 77046-3419

Note: If any of the information shown on the mailing label requires correction, please e-mail any corrections to form@sipc.org and so indicate on the form filed.  
  
Name and telephone number of person to contact respecting this form.  
Joseph Birkhofer 713-355-7171

2. A. General Assessment (item 2e from page 2)	\$ <u>1075.50</u>
B. Less payment made with SIPC-6 filed (exclude interest)	( <u>420.18</u> )
<u>07/29/2015</u> Date Paid	
C. Less prior overpayment applied	( <u>0</u> )
D. Assessment balance due or (overpayment)	<u>655.32</u>
E. Interest computed on late payment (see instruction E) for _____ days at 20% per annum	<u>0</u>
F. Total assessment balance and interest due (or overpayment carried forward)	\$ <u>655.32</u>
G. PAID WITH THIS FORM: Check enclosed, payable to SIPC Total (must be same as F above)	\$ <u>655.32</u>
H. Overpayment carried forward	\$( <u>0</u> )

3. Subsidiaries (S) and predecessors (P) included in this form (give name and 1934 Act registration number):  
\_\_\_\_\_  
\_\_\_\_\_

The SIPC member submitting this form and the person by whom it is executed represent thereby that all information contained herein is true, correct and complete.

Legacy Asset Securities, Inc  
(Name of Corporation, Partnership or other organization)  
[Signature]  
(Authorized Signatory)  
President  
(Title)

Dated the 28<sup>th</sup> day of January, 2016.

This form and the assessment payment is due 60 days after the end of the fiscal year. Retain the Working Copy of this form for a period of not less than 6 years, the latest 2 years in an easily accessible place.

**SIPC REVIEWER**

Dates: Postmarked      Received      Reviewed

Calculations \_\_\_\_\_      Documentation \_\_\_\_\_      Forward Copy \_\_\_\_\_

Exceptions: \_\_\_\_\_

Disposition of exceptions: \_\_\_\_\_

**DETERMINATION OF "SIPC NET OPERATING REVENUES"  
AND GENERAL ASSESSMENT**

Amounts for the fiscal period  
beginning 1/1/2015  
and ending 12/31/2015

**Item No.**

Eliminate cents

2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)

\$ 654,210

**2b. Additions:**

(1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above.

0

(2) Net loss from principal transactions in securities in trading accounts.

0

(3) Net loss from principal transactions in commodities in trading accounts.

0

(4) Interest and dividend expense deducted in determining item 2a.

0

(5) Net loss from management of or participation in the underwriting or distribution of securities.

0

(6) Expenses other than advertising, printing, registration fees and legal fees deducted in determining net profit from management of or participation in underwriting or distribution of securities.

0

(7) Net loss from securities in investment accounts.

0

Total additions

654,210

**2c. Deductions:**

(1) Revenues from the distribution of shares of a registered open end investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security futures products.

213,832

(2) Revenues from commodity transactions.

0

(3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.

10,178

(4) Reimbursements for postage in connection with proxy solicitation.

0

(5) Net gain from securities in investment accounts.

0

(6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date.

0

(7) Direct expenses of printing advertising and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act).

0

(8) Other revenue not related either directly or indirectly to the securities business.  
(See Instruction C);

0

(Deductions in excess of \$100,000 require documentation)

(9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA Line 13, Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.

\$ 0

(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).

\$ 0

Enter the greater of line (i) or (ii)

0

Total deductions

224,010

d. SIPC Net Operating Revenues

\$ 430,200

e. General Assessment @ .0025

\$ 1075.50

(to page 1, line 2.A.)



February 24, 2016

SEC  
Mail Processing  
Section

Securities & Exchange Commission Headquarters  
100 F. Street, NE  
Washington, D.C. 20549

FEB 26 2016  
Washington DC  
403

To Whom It May Concern:

Enclosed is a copy of Legacy Asset Securities 2015 Audited Annual Report.  
If you have any questions, please contact me at 713-355-7171.

Kind regards,

A handwritten signature in black ink, appearing to read "Joe Birkofer", with a long horizontal flourish extending to the right.

Joseph Birkofer, CFP®  
Principal